

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
SANDOVAL COUNTY, NEW MEXICO;)
SANDOVAL COUNTY BOARD OF) NO. CIV 88-1457-BRB-DJS
COMMISSIONERS; WILLIAM SAPIEN,)
DON LEONARD, DAVID BENCY, JACK E.)
THOMAS, and JOSHUA MADALENA,)
Members of the Sandoval County)
Board of Commissioners; and)
SALLY PADILLA, Sandoval County)
Clerk,)
)
Defendants.)
)

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A REVISED JOINT
STIPULATION AND REVISED NAEIP**

The parties, United States of America and Sandoval County, hereby move this Court to allow the parties until September 28, 2007 to submit a joint stipulation and revised Native American Election Information Program (“NAEIP”).

On July 24, 2007, the Court ordered the parties “to file a joint report setting forth any agreements they have reached as well as identifying any issues the Court need resolve” by September 10, 2007. (Doc. No. 185). The parties filed that Report on September 10, 2007, and noted there were no unresolved issues. The parties further stated their intent to file a revised Joint Stipulation and revised NAEIP by September 17, 2007. See Doc. No. 205.

The parties have conferred on an ongoing basis to finalize a Joint Stipulation and a streamlined NAEIP. Despite best efforts, however, and because of a temporary but inordinate spike in the Sandoval County Attorney's other professional obligations, the parties have not yet finalized the revised Joint Stipulation and NAEIP. The parties intend to submit a finalized Joint Stipulation and NAEIP to the Court by September 28, 2007.

WHEREFORE, the parties respectfully request that this Court enter an order extending the parties' time for filing the revised Joint Stipulation and revised NAEIP until September 28, 2007.

Respectfully submitted this 17th day of September 2007.

For Plaintiff:
UNITED STATES OF AMERICA

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RAYMOND HAMILTON
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RENA J. COMISAC
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For Defendants:
SANDOVAL COUNTY, et al.

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Electronically Filed on September 17, 2007

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